

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

ST. VINCENT CATHOLIC  
CHARITIES,

*Plaintiff,*

v.

INGHAM COUNTY BOARD OF  
COMMISSIONERS,

*Defendant.*

No. 1:19-CV-1050

Hon. Robert J. Jonker

**PLAINTIFF'S MOTION  
FOR AWARD OF  
ATTORNEYS' FEES,  
EXPENSES, AND INTEREST**

Pursuant to 42 U.S.C. § 1988(b) and this Court's order, ECF No. 84, Plaintiff respectfully moves this Court for an order requiring Defendant to pay Plaintiff's reasonable attorneys' fees, expenses, and interest, as set out in the memorandum filed in support of this motion. Plaintiff is the prevailing party under the Court's judgment. *See* ECF Nos. 74, 78.

A memorandum in support of this motion satisfying the requirements of Local Rule 7.1(d), accompanying exhibits, a certificate of concurrence, and a proposed order are filed contemporaneously with this motion.

WHEREFORE, Plaintiff respectfully requests that the Court order Defendant to pay attorneys' fees, expenses, and interest, in the amounts set out in the memorandum filed in support of this motion.

Dated: October 16, 2023

Respectfully submitted,

*/s/ William J. Haun*  
William J. Haun  
Mark L. Rienzi  
Lori H. Windham  
Nicholas R. Reaves  
The Becket Fund for Religious Liberty  
1919 Pennsylvania Ave. NW  
Suite 400  
Washington, DC 20006  
(202) 955-0095  
whaun@becketlaw.org

William R. Bloomfield (P68515)  
Catholic Diocese of Lansing  
Lansing, Michigan 48933-1122  
wbloomfield@dioceseoflansing.org  
(517) 342-2522  
whaun@becketlaw.org

*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 16, 2023, the foregoing, along with its accompanying memorandum, was served on all parties via ECF.

*/s/ William J. Haun*  
William J. Haun